

FILED

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

OCT 19 2022

By DAVID CREWS, CLERK Deputy

UNITED STATES OF AMERICA

v.

ROBERT PEARSON
LAKISHA PEARSON
GLENDON JONES
RONEISHA DENNIS
MELVIN HARRIS
DAMETRIS PEARSON
TERRANCE ISOM
DEVONTE SMITH
JALIYAH GODWIN
JACOBY ALEXANDER
KEVIN ANDERSON
DIANNE COX
DORIS PEARSON and
MARECEO HOBSON

Defendants

) Criminal No. 3:22CR 132
)
) Violations:
)
) Count One: Conspiracy to Commit Wire
) Fraud
) (18 U.S.C. §§ 1343 & 1349)
)
) Counts Two – Fourteen: Wire Fraud
) (18 U.S.C. § 1343)
)
) Counts Fifteen – Twenty-Eight: Money
) Laundering
) (18 U.S.C. § 1957(a))
)
) Wire Fraud Forfeiture Allegation
) (18 U.S.C. § 981(a)(1)(C) and
) 28 U.S.C. § 2461)
)
) Money Laundering Forfeiture Allegation
) (18 U.S.C. § 982(a)(1))
)

The Grand Jury charges that:

INDICTMENT

At all times relevant to this Indictment:

Introduction

A. Paycheck Protection Program

1. The Paycheck Protection Program ("PPP") was a COVID-19 pandemic relief program administered by the Small Business Administration ("SBA") that provided forgivable

loans to small businesses for job retention and certain other expenses. The PPP permitted participating third-party lenders to approve and disburse SBA-backed PPP loans to cover payroll, fixed debts, utilities, rent/mortgage, accounts payable and other bills incurred by qualifying businesses during, and resulting from, the COVID-19 pandemic. PPP loans were fully guaranteed by the SBA.

2. To obtain a PPP loan, a qualifying business had to submit a PPP loan application, which was signed by an authorized representative of the business. The PPP loan application required the business (through its authorized representative) to acknowledge the program rules and make certain affirmative certifications to be eligible to obtain the PPP loan, including that the business was in operation and either had employees for whom it paid salaries and payroll taxes or paid independent contractors. A business applying for a PPP loan was required to provide documentation showing its payroll expenses, such as filed federal income tax documents.
3. The qualifying business had to have been in operation since at least February 15, 2020.
4. PPP loan applications were electronically submitted or caused to be submitted by the borrower and received through SBA servers located in Virginia / Oregon. [Virginia - PPP Round 1 or 2 or Oregon if submitted after 1/11/2021 in Round 3]. Once approved, the business received the PPP loan proceeds via an electronic funds transfer from the third-party lender to a financial account under the control of the business.
5. The proceeds of a PPP loan could be used for certain specified items, such as payroll costs, costs related to the continuation of group health care benefits, or mortgage

interest payments. The proceeds of a PPP loan were not permitted to be used by the borrowers to purchase consumer goods, automobiles, personal residences, clothing, jewelry, to pay the borrower's personal federal income taxes, or to fund the borrower's ordinary day-to-day living expenses unrelated to the specified authorized expenses.

6. In addition, businesses applying for a PPP loan were required to provide documentation showing their payroll expenses. Businesses applying for PPP loans had to certify “that the information provided in th[e] application and the information provided in all supporting documents and forms is true and accurate in all material respects” and acknowledge “that knowingly making a false statement to obtain a guaranteed loan from SBA is punishable under the law.”
7. A PPP loan application was processed by a participating lender. If a PPP loan application was approved, the participating lender funded the PPP loan using its own monies, which were guaranteed by the SBA. Data from the application, including information about the borrower, the total amount of the loan, and the listed number of employees, was transmitted by the lender to the SBA while processing the loan.

B. Relevant Individuals and Entities

8. Unity Tax Express, LLC, was a business in Mississippi, registered with the Mississippi Secretary of State on or about February 15, 2021. The company’s purported line of business included tax preparation services. The defendant ROBERT PEARSON was the president and owner of many companies, including Unity Tax Express, LLC. The defendant LAKSIHA PEARSON was the registered agent of Unity Tax Express, LLC.

9. Defendant ROBERT PEARSON was the owner of the Regions Bank business account of Unity Tax Express, LLC. Defendant LAKSIHA PEARSON had access to the Regions Bank business account of Unity Tax Express, LLC.
10. Trucking on Faith, LLC, was a business in Mississippi, registered with the Mississippi Secretary of State on or about March 23, 2020. Defendant GLENDON JONES was registered as the registered agent and incorporator of Trucking on Faith, LLC. The company's purported line of business included general freight trucking. This business was dissolved on or about September 7, 2021. On May 5, 2022, the business Trucking on Faith, LLC, registered with the Mississippi Secretary of State and Defendant GLENDON JONES was listed as the registered agent and Defendant LAKISHA PEARSON was listed as a partner.
11. Alexander and Sons, LLC, was a business in Mississippi, registered with the Mississippi Secretary of State on or about February 12, 2021. Defendant JACOBY ALEXANDER was registered as the registered agent and manager of Alexander and Sons, LLC. The company's purported line of business included general freight trucking.
12. Reliable Brokerage, LLC, was a business in Mississippi, registered with the Mississippi Secretary of State on or about February 15, 2021. Defendant GLENDON JONES is registered as the registered agent and organizer of Reliable Brokerage, LLC. The company's purported line of business included commodity contracts brokerage.
13. All in One Brokerage, LLC, was a business in Mississippi, registered with the Mississippi Secretary of State on or about February 15, 2021. Defendant RONEISHA

DENNIS was registered as the registered agent and manager of All in One Brokerage, LLC. The company's purported line of business included commodity contracts brokerage.

14. Big Baby Brokerage, LLC, was a business in Mississippi, registered with the Mississippi Secretary of State on or about February 15, 2021. Defendant MELVIN HARRIS was registered as the registered agent and manager of Big Baby Brokerage, LLC. The company's purported line of business included commodity contracts brokerage.

15. 3 Love Trucking, LLC, was a business in Mississippi, registered with the Mississippi Secretary of State on or about February 16, 2021. Defendant MARECEO HOBSON was registered as the registered agent and manager of 3 Love Trucking, LLC. The company's purported line of business included general freight trucking.

16. DLP Brokerage, LLC, was a business in Mississippi, registered with the Mississippi Secretary of State on or about February 15, 2021. Defendant DAMETRIS PEARSON was registered as the registered agent and manager of DLP Brokerage LLC. The company's purported line of business included commodity contracts brokerage.

17. Byhalia Lawn Service, LLC, was a business in Mississippi, registered with the Mississippi Secretary of State on or about February 16, 2021. Defendant DIANNE COX is registered as the registered agent and manager of Byhalia Lawn Service, LLC. The company's purported line of business included landscaping services.

18. Grind Time Trucking, LLC, was a business in Mississippi, registered with the Mississippi Secretary of State on or about February 16, 2021. Defendant DEVONTE

SMITH was registered as the registered agent and manager of Grind Time Trucking, LLC. The company's purported line of business included general freight trucking.

19. Castro Freight, LLC, was a business in Mississippi, registered with the Mississippi Secretary of State on or about February 24, 2021. Defendant KEVIN ANDERSON was registered as the registered agent and manager of Castro Freight, LLC. The company's purported line of business included commodity contracts brokerage.

20. JJG Brokerage, LLC, was a business in Mississippi, registered with the Mississippi Secretary of State on or about March 2, 2021. Defendant JALIYAH GODWIN was registered as the registered agent and manager of JJG Brokerage, LLC. The company's purported line of business included commodity contracts brokerage.

21. Trey's Consolidated Freight, LLC, was a business in Mississippi, registered with the Mississippi Secretary of State on or about February 15, 2021. Defendant TERRANCE ISOM was registered as the registered agent and manager of Trey's Consolidated Freight, LLC. The company's purported line of business included commodity contracts brokerage.

22. A and D Trucking, LLC, was a business in Mississippi, registered with the Mississippi Secretary of State on or about February 16, 2021. Defendant DORIS PEARSON was registered as the registered agent and manager of A and D Trucking, LLC. The company's purported line of business included general freight trucking.

C. Banks and Paycheck Protection Program

23. Banks that participated as a lender in a program referred to as the Paycheck Protection Program (PPP) operated by the United States Small Business Administration (SBA), were authorized to lend funds to eligible borrowers under the terms of the PPP. To obtain a PPP loan through the banks, customers submitted a loan application to the banks, and an employee of the bank submitted the loan information through an SBA loan application portal. Once the SBA approved the loan, the bank would issue the loan funds to the customer.
24. The following were banks that participated in the PPP relevant to this case:
- a. ReadyCap Lending, LLC, with operation headquarters in New York, New York.
 - b. Capital Plus Financial, with operation headquarters in Bedford, Texas.
 - c. Prestamos CDFI, LLC, with operation headquarters in Phoenix, Arizona.
 - d. Kabbage, Inc, with operation headquarters in Norcross, Georgia.
 - e. Community Federal Savings Bank was a federally insured financial institution with operation headquarters in Woodhaven, New York.
 - f. Transportation Alliance Bank, doing business as TAB Bank, was a federally insured financial institution headquartered in Ogden, Utah.
 - g. Cross River Bank was a federally insured financial institution headquartered in Teaneck, New Jersey.
 - h. Customers Bank was a federally insured financial institution headquartered in Phoenixville, Pennsylvania.

- i. Trustmark Bank was a federally insured financial institution headquartered in Jackson, Mississippi.

COUNT ONE
Conspiracy to Commit Wire Fraud
(18 U.S.C. §§ 1343 & 1349)

The Grand Jury charges:

25. The Grand Jury re-alleges and incorporates by reference paragraphs 1-23 of this Indictment.

26. On or about January 1, 2021, and continuing until at least on or around June 30, 2021, in the Northern District of Mississippi and elsewhere, the defendants,

ROBERT PEARSON, LAKISHA PEARSON, GLENDON JONES, RONEISHA DENNIS, MELVIN HARRIS, DAMETRIS PEARSON, TERRANCE ISOM, DEVONTE SMITH, JALIYAH GODWIN, JACOBY ALEXANDER, KEVIN ANDERSON, DIANNE COX, DORIS PEARSON, and MARECEO HOBSON,

did knowingly and willfully, that is, with the intent to further the objects of the conspiracy, combine, conspire, confederate, and agree with each other, and with others known and unknown to the Grand Jury, to knowingly, and with the intent to defraud, devise, and intend to devise, a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, and for the purpose of executing the scheme and artifice, did knowingly transmit and cause to be transmitted, by means of wire communication in interstate commerce, certain writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343.

Purpose of the Conspiracy

27. The purpose of the scheme was for defendants ROBERT PEARSON, LAKISHA PEARSON, GLENDON JONES, RONEISHA DENNIS, MELVIN HARRIS, DAMETRIS PEARSON, TERRANCE ISOM, DEVONTE SMITH, JALIYAH GODWIN, JACOBY ALEXANDER, KEVIN ANDERSON, DIANNE COX, DORIS PEARSON, and MARECEO HOBSON to obtain PPP loan proceeds under false and fraudulent pretenses, including representing that their businesses were viable and ongoing businesses when they were not existing or were not doing business until after February 1, 2020 or February 15, 2020, and did not employ the number of persons which the defendants represented to the lenders and SBA were so employed.

Manner and Means of the Conspiracy

28. Beginning on or about January 10, 2021, and continuing until at least on or around January 25, 2022, in the Northern District of Mississippi, defendants ROBERT PEARSON, LAKISHA PEARSON, GLENDON JONES, RONEISHA DENNIS, MELVIN HARRIS, DAMETRIS PEARSON, TERRANCE ISOM, DEVONTE SMITH, JALIYAH GODWIN, JACOBY ALEXANDER, KEVIN ANDERSON, DIANNE COX, DORIS PEARSON, and MARECEO HOBSON devised a scheme to defraud, and to obtain PPP funds, by filing false and fraudulent PPP applications and agreements on behalf of their respective businesses, the respective banks, and the SBA and by falsely agreeing only to use the funds for payroll expenses

or other permissible expenses for their respective businesses when, in fact, they intended to use the funds for other purposes, including funding other businesses, purchasing real and personal property, paying personal expenses, and paying “kickbacks” to defendants ROBERT PEARSON, LAKISHA PEARSON, and GLENDON JONES, as follows:

Approximate Date	Applicant	Description
February 16, 2021	DEVONTE SMITH	The Grind Time Trucking, LLC PPP loan application containing false information and documents provided by defendant DEVONTE SMITH and submitted by DEVONTE SMITH from Marshall County, Mississippi to SBA approved lender ReadyCap Lending, LLC, headquartered in New York, New York.
February 20, 2021	GLENDON JONES	The Reliable Brokerage, LLC PPP loan application containing false information and documents provided by defendant GLENDON JONES and submitted by GLENDON JONES from Marshall County, Mississippi to SBA approved lender ReadyCap Lending, LLC, headquartered in New York, New York.
February 20, 2021	RONEISHA DENNIS	The All in One Brokerage, LLC PPP loan application containing false information and documents provided by defendant RONEISHA DENNIS and submitted by RONEISHA DENNIS from Marshall County, Mississippi to SBA approved lender ReadyCap Lending, LLC, headquartered in New York, New York.

February 20, 2021	TERRANCE ISOM	The Trey's Consolidated Freight, LLC PPP loan application containing false information and documents provided by defendant TERRANCE ISOM and submitted by TERRANCE ISOM from Marshall County, Mississippi to SBA approved lender ReadyCap Lending, LLC, headquartered in New York, New York.
February 21, 2021	JACOBY ALEXANDER	The Alexander and Sons, LLC PPP loan application containing false information and documents provided by defendant JACOBY ALEXANDER and submitted by JACOBY ALEXANDER from Marshall County, Mississippi to SBA approved lender ReadyCap, Lending, LLC, headquartered in New York, New York.
February 25, 2021	KEVIN ANDERSON	The Castro Freight, LLC PPP loan application containing false information and documents provided by defendant KEVIN ANDERSON and submitted by KEVIN ANDERSON from Marshall County, Mississippi to SBA approved lender ReadyCap Lending, LLC, headquartered in New York, New York.
March 1, 2021	JALIYAH GODWIN	The JJG Brokerage, LLC PPP loan application containing false information and documents provided by defendant JALIYAH GODWIN and submitted by JALIYAH GODWIN from Marshall County, Mississippi to SBA approved lender ReadyCap Lending, LLC,

		headquartered in New York, New York.
March 25, 2021	MELVIN HARRIS	The Big Baby Brokerage, LLC PPP loan application containing false information and documents provided by defendant MELVIN HARRIS and submitted by MELVIN HARRIS from Marshall County, Mississippi to SBA approved lender Customers Bank, headquartered in Phoenixville, Pennsylvania.
March 26, 2021	MARECEO HOBSON	The 3 Love Trucking, LLC PPP loan application containing false information and documents provided by defendant MARECEO HOBSON and submitted by MARECEO HOBSON from Marshall County, Mississippi to SBA approved lender Customers Bank, headquartered in Phoenixville, Pennsylvania.
April 26, 2021	ROBERT PEARSON	The Unity Tax Express, LLC PPP loan application containing false information and documents provided by defendant ROBERT PEARSON and submitted by ROBERT PEARSON from Marshall County, Mississippi to SBA approved lender Community Federal Savings Bank, headquartered in Woodhaven, New York.
April 29, 2021	DAMETRIS PEARSON	The DLP Brokerage, LLC PPP loan application containing false information and documents provided by defendant DAMETRIS PEARSON and submitted by DAMETRIS PEARSON from Marshall County, Mississippi to SBA approved lender Community Federal Savings Bank,

		headquartered in Woodhaven, New York.
April 29, 2021	DIANNE COX	The Byhalia Lawn Service, LLC PPP loan application containing false information and documents provided by defendant DIANNE COX and submitted by DIANNE COX from Marshall County, Mississippi to SBA approved lender Community Federal Savings Bank, headquartered in Woodhaven, New York.
May 24, 2021	DORIS PEARSON	The A and D Trucking, LLC loan application containing false information and documents provided by defendant DORIS PEARSON and submitted by DORIS PEARSON from Marshall County, Mississippi to SBA approved lender Community Federal Savings Bank, headquartered in Woodhaven, New York.

29. To further the conspiracy and to achieve its purposes, defendants ROBERT PEARSON, LAKISHA PEARSON, GLENDON JONES, RONEISHA DENNIS, MELVIN HARRIS, DAMETRIS PEARSON, TERRANCE ISOM, DEVONTE SMITH, JALIYAH GODWIN, JACOBY ALEXANDER, KEVIN ANDERSON, DIANNE COX, DORIS PEARSON, and MARECEO HOBSON did commit numerous overt acts, including, but not limited to the following:

- a. On or about February 25, 2021, defendant JACOBY ALEXANDER of Alexander and Sons, LLC, deposited \$84,000.00 in PPP funds into Unity Tax Express, LLC bank account ending in # 4811 controlled by defendants

ROBERT PEARSON and LAKISHA PEARSON as a kickback for their services.

- b. On or about February 25, 2021, defendant JACOBY ALEXANDER deposited \$25,000.00 in PPP funds into Trucking on Faith, LLC bank account ending in #0315 controlled by defendant GLENDON JONES as a kickback for his services.
- c. On or about March 8, 2021, defendant DEVONTE SMITH of Grind Time Trucking, LLC deposited \$63,700.00 in PPP funds into Unity Tax Express, LLC bank account ending in #4811 controlled by defendants ROBERT PEARSON and LAKISHA PEARSON as a kickback for their services.
- d. On or about March 8, 2021, defendant DEVONTE SMITH of Grind Time Trucking, LLC deposited \$10,000.00 in PPP funds into Trucking on Faith, INC bank account ending in #0135 controlled by defendant GLENDON JONES as a kickback for his services.
- e. On or about March 8, 2021, defendant KEVIN ANDERSON of Castro Freight, LLC deposited \$76,312.00 in PPP funds into Unity Tax Express, LLC bank account ending in #4811 controlled by defendants ROBERT PEARSON and LAKISHA PEARSON as a kickback for their services.
- f. On or about March 11, 2021, defendant JALIYAH GODWIN deposited \$76,312.00 in PPP funds into Unity Tax Express, LLC bank account ending in #4811 controlled by defendants ROBERT PEARSON and LAKISHA PEARSON as a kickback for their services.

- g. On or about March 18, 2021, defendant TERRANCE ISOM deposited \$76,312.00 in PPP funds into GKWTD Trucking, LLC bank account ending in #3294 controlled by defendants ROBERT PEARSON and LAKISHA PEARSON as a kickback for their services.
- h. On or about March 18, 2021, defendant GLENDON JONES of Reliable Brokerage, LLC, deposited \$76,312.00 in PPP funds into Unity Tax Express, LLC bank account ending in #4811 controlled by defendants ROBERT PEARSON and LAKISHA PEARSON as a kickback for their services.
- i. On or about March 18, 2021, defendant RONEISHA DENNIS of All in One Brokerage, LLC, deposited \$76,312.00 in PPP funds into Unity Tax Express, LLC bank account ending in #4811 controlled by defendants ROBERT PEARSON and LAKISHA PEARSON as a kickback for their services.
- j. On or about April 5, 2021, defendant MELVIN HARRIS of Big Baby Brokerage, LLC, deposited \$79,904.00 in PPP funds into Unity Tax Express, LLC bank account ending in #4811 controlled by defendants ROBERT PEARSON and LAKISHA PEARSON as a kickback for their services.
- k. On or about April 6, 2021, defendant MARECEO HOBSON of 3 Love Trucking, LLC deposited \$53,000.00 in PPP funds into Unity Tax Express, LLC bank account ending in #4811 controlled by defendants ROBERT PEARSON and LAKISHA PEARSON as a kickback for their services.
- l. On or about May 24, 2021, defendant DORIS PEARSON of A and D Trucking, LLC deposited \$62,000.00 in PPP funds into Unity Tax Express,

LLC bank account ending in #4811 controlled defendants ROBERT PEARSON and LAKISHA PEARSON as a kickback for their services.

m. On or about May 26, 2021, defendant DAMETRIS PEARSON of DLP Brokerage, LLC deposited \$58,691.00 in PPP funds into Unity Tax Express, LLC bank account ending in #4811 controlled by defendants ROBERT PEARSON and LAKISHA PEARSON as a kickback for their services.

n. On or about May 28, 2021, defendant DORIS PEARSON of A AND D Trucking, LLC, deposited \$100,000.00 in PPP funds into Doris P's Fast Food and Catering bank account ending in #8972 controlled by Doris Pearson.

o. On or about June 11, 2021, defendant DORIS PEARSON deposited \$75,000.00 in PPP funds into GKWTD Trucking, LLC bank account ending in #3294 controlled by defendants ROBERT PEARSON and LAKISHA PEARSON as a kickback for their services.

30. From on or about February 1, 2021, through on or about April 31, 2021, substantial monies were transferred by defendants ROBERT PEARSON, GLENDON JONES, MELVIN HARRIS, DEVONTE SMITH, JACOBY ALEXANDER, and KEVIN ANDERSON, who misused the PPP funds by diverting them to other businesses and using them on unauthorized expenses, including, but not limited to, purchases of personal property, as follows:

a. On or about February 25, 2021, defendant GLENDON JONES did use \$25,000.00 in PPP funds to purchase three off road vehicles, including: a 2021 Polaris ATV VIN/SERIAL: 4XASXE858MB330908; a 2021 CAN AM ATV

VIN/SERIAL: 3JBLGAR44MJ003270; and a 2021 CAN AM ATV

VIN/SERIAL: 3JBLWAT41MJ001360.

- b. On or about February 27, 2021, defendant JACOBY ALEXANDER did use \$31,245.32 in PPP funds to purchase a 2021 Polaris ATV VIN/SERIAL: 3NSPAL927MF146645.
- c. On or about March 2, 2021, defendant ROBERT PEARSON did use \$34,987.01 in PPP funds to purchase a 2021 Toyota Camry VIN: 4T1K61AK8MU543622.
- d. On or about March 9, 2021, defendant DEVONTE SMITH did use \$12,000.00 in PPP funds to purchase a 1998 Pontiac Firebird VIN: 2G2FV22G6W2218134.
- e. On or about March 9, 2021, defendant KEVIN ANDERSON did use \$25,081.50 in PPP funds to purchase a 2013 Jaguar XJ VIN: SAJWJ2GD9D8V47773.
- f. On or about March 18, 2021, defendant GLENDON JONES did use \$86,727.88 in PPP funds to purchase a 2021 F-350 Ford truck VIN: 1FT8W3BT0MEC97502.
- g. On or about March 18, 2021, defendant DEVONTE SMITH did use \$15,000.00 in PPP funds to purchase a Freightliner Colombia 120 VIN: 1FUJA6CV37LW93837.
- h. On or about March 18, 2021, defendant KEVIN ANDERSON did use

\$11,134.79 in PPP funds to purchase two industrial lawn mowers and an open gate trailer. The items are specifically identified as a 4-Pro Turn Z Lawn mower VIN/SERIAL: 002290, an Areins Kawasaki Lawn mower VIN/SERIAL: 023368, and a Gate Trailer Open trailer VIN/SERIAL: 46CFB1415MM038394.

- i. On or about March 19, 2021, defendant KEVIN ANDERSON did use \$14,840.00 in PPP funds to purchase a 2021 Kawasaki ATV JKAVFDL35MB509684 and a 2021 CAN AM ATV 3JBLGAR46MJ004100.
- j. On or about March 20, 2021, defendant ROBERT PEARSON did use \$55,800.00 in PPP funds to purchase a 2021 Cadillac CT5 VIN: 1G6DN5RW9M0127491.
- k. On or about March 20, 2021, defendant ROBERT PEARSON did use \$78,801.79 in PPP funds to purchase a 2021 GMC Yukon VIN: 1GKS1GKD8MR295966.
- l. On or about March 22, 2021, defendant ROBERT PEARSON did use \$18,927.27 in PPP funds to pay off a 2016 Kenworth semi-truck VIN: 1XKYDP9X1GJ129602.
- m. On or about April 5, 2021, defendant MELVIN HARRIS did use \$67,394.24 in PPP funds to purchase a 2018 Dodge Ram truck.
- n. On or about May 22, 2021, defendant ROBERT PEARSON did use \$71,414.54 in PPP funds to purchase a 2021 GMC Sierra VIN: 1GT49REY8MF125888.

All in violation of Title 18, United States Code, Sections 1343 and 1349.

COUNTS TWO - FOURTEENWire Fraud
(18 U.S.C. § 1343)

31. The Grand Jury re-alleges and incorporates by reference paragraphs 1-29 of this Indictment.

32. On or about the dates set forth below, in the Northern District of Mississippi and elsewhere, the defendants,

ROBERT PEARSON, GLENDON JONES, RONEISHA DENNIS, MELVIN HARRIS, DAMETRIS PEARSON, TERRANCE ISOM, DEVONTE SMITH, JALIYAH GODWIN, JACOBY ALEXANDER, KEVIN ANDERSON, DIANNE COX, DORIS PEARSON, and MARECEO HOBSON,

aided and abetted by one another, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, that is, to submit applications for PPP loans containing material misrepresentations regarding numbers of employees, payroll paid, the nature of their businesses, and false documents, including a falsified bank statement regarding payroll payments, defendants did transmit and cause to be transmitted by means of wire communications in interstate commerce, writings, signs, signals, pictures, and sounds for the purpose of executing the scheme to defraud, as set forth below:

Count	Approximate Date	Defendant	Description
2	February 16, 2021	DEVONTE SMITH	The Grind Time Trucking, LLC PPP loan application containing false information and documents provided by defendant DEVONTE SMITH and submitted by DEVONTE SMITH from Marshall County, Mississippi to SBA approved

			lender ReadyCap Lending, LLC, headquartered in New York, New York.
3	February 20, 2021	GLENDON JONES	The Reliable Brokerage, LLC PPP loan application containing false information and documents provided by defendant GLENDON JONES and submitted by GLENDON JONES from Marshall County, Mississippi to SBA approved lender ReadyCap Lending, LLC, headquartered in New York, New York.
4	February 20, 2021	RONEISHA DENNIS	The All in One Brokerage, LLC PPP loan application containing false information and documents provided by defendant RONEISHA DENNIS and submitted by RONEISHA DENNIS from Marshall County, Mississippi to SBA approved lender ReadyCap Lending, LLC, headquartered in New York, New York.
5	February 20, 2021	TERRANCE ISOM	The Trey's Consolidated Freight, LLC PPP loan application containing false information and documents provided by defendant TERRANCE ISOM and submitted by TERRANCE ISOM from Marshall County, Mississippi to SBA approved lender ReadyCap Lending, LLC, headquartered in New York, New York.
6	February 21, 2021	JACOBY ALEXANDER	The Alexander and Sons, LLC PPP loan application containing false information and documents provided by defendant JACOBY ALEXANDER and submitted by JACOBY ALEXANDER from Marshall County, Mississippi to SBA approved lender ReadyCap, Lending, LLC, headquartered in New York, New York.
7	February 25, 2021	KEVIN ANDERSON	The Castro Freight, LLC PPP loan application containing false information

			and documents provided by defendant KEVIN ANDERSON and submitted by KEVIN ANDERSON from Marshall County, Mississippi to SBA approved lender ReadyCap Lending, LLC, headquartered in New York, New York.
8	March 1, 2021	JALIYAH GODWIN	The JJG Brokerage, LLC PPP loan application containing false information and documents provided by defendant JALIYAH GODWIN and submitted by JALIYAH GODWIN from Marshall County, Mississippi to SBA approved lender ReadyCap Lending, LLC, headquartered in New York, New York.
9	March 25, 2021	MELVIN HARRIS	The Big Baby Brokerage, LLC PPP loan application containing false information and documents provided by defendant MELVIN HARRIS and submitted by MELVIN HARRIS from Marshall County, Mississippi to SBA approved lender Customers Bank, headquartered in Phoenixville, Pennsylvania.
10	March 26, 2021	MARECEO HOBSON	The 3 Love Trucking, LLC PPP loan application containing false information and documents provided by defendant MARECEO HOBSON and submitted by MARECEO HOBSON from Marshall County, Mississippi to SBA approved lender Customers Bank, headquartered in Phoenixville, Pennsylvania.
11	April 26, 2021	ROBERT PEARSON	The Unity Tax Express, LLC PPP loan application containing false information and documents provided by defendant ROBERT PEARSON and submitted by ROBERT PEARSON from Marshall County, Mississippi to SBA approved lender Community Federal Savings Bank, headquartered in Woodhaven, New York.

12	April 29, 2021	DAMETRIS PEARSON	The DLP Brokerage, LLC PPP loan application containing false information and documents provided by defendant DAMETRIS PEARSON and submitted by DAMETRIS PEARSON from Marshall County, Mississippi to SBA approved lender Community Federal Savings Bank, headquartered in Woodhaven, New York.
13	April 29, 2021	DIANNE COX	The Byhalia Lawn Service, LLC PPP loan application containing false information and documents provided by defendant DIANNE COX and submitted by DIANNE COX from Marshall County, Mississippi to SBA approved lender Community Federal Savings Bank, headquartered in Woodhaven, New York.
14	May 24, 2021	DORIS PEARSON	The A AND D Trucking, LLC loan application containing false information and documents provided by defendant DORIS PEARSON and submitted by DORIS PEARSON from Marshall County, Mississippi to SBA approved lender Community Federal Savings Bank, headquartered in Woodhaven, New York.

Each transmission being a violation of Title 18, United State Code, Section 1343.

COUNTS FIFTEEN – TWENTY-EIGHT

Money Laundering
(18 U.S.C. § 1957)

The Grand Jury further charges:

33. The Grand Jury re-alleges and incorporates by reference paragraphs 1-31 of this Indictment.

34. On or about the dates set forth below, in the Northern District of Mississippi and elsewhere, the defendants,

ROBERT PEARSON, LAKISHA PEARSON, GLENDON JONES, RONEISHA DENNIS, MELVIN HARRIS, DAMETRIS PEARSON, TERRANCE ISOM, DEVONTE SMITH, JALIYAH GODWIN, JACOBY ALEXANDER, KEVIN ANDERSON, DORIS PEARSON, and MARECEO HOBSON,

aided and abetted by one another, knowingly engaged and attempted to engage in the following monetary transactions by, through, and to a financial institution, in and affecting interstate commerce, in criminally derived property of a value greater than \$10,000, that is, the deposit, withdrawal, transfer, and exchange of United States currency, such property constituting and having been derived from a specified unlawful activity, that is, the wire fraud scheme and artifice alleged herein in paragraphs 1-37 of this indictment, in violation of 18 U.S.C. § 1343:

Count	Approximate Date	Defendant or Defendants	Description
15	February 25, 2021	JACOBY ALEXANDER, ROBERT PEARSON, and LAKISHA PEARSON	Defendant JACOBY ALEXANDER did transfer \$84,000.00 in PPP funds from Alexander and Sons, LLC account ending in #1576 to defendants ROBERT PEARSON and LAKISHA PEARSON's Unity Tax Express, LLC account.
16	February 25, 2021	JACOBY ALEXANDER and GLENDON JONES	Defendant JACOBY ALEXANDER did transfer \$25,000.00 in PPP funds to defendant GLENDON JONES's Trucking on Faith, LLC account.
17	March 8, 2021	DEVONTE SMITH and GLENDON JONES	Defendant DEVONTE SMITH did transfer \$10,000.00 in PPP funds from Grind Time Trucking, LLC account ending in #5125 \$10,000.00 to defendant GLENDON JONES' Trucking on Faith, LLC account.
18	March 8, 2021	DEVONTE SMITH, ROBERT PEARSON, and LAKISHA PEARSON	Defendant DEVONTE SMITH did transfer \$63,700.00 in PPP funds from Grind Time Trucking, LLC account ending in #5125 to defendants ROBERT PEARSON and LAKISHA PEARSON's Unity Tax Express, LLC account.
19	March 8, 2021	KEVIN ANDERSON, ROBERT PEARSON, and LAKISHA PEARSON	Defendant KEVIN ANDERSON did transfer \$76,312.00 in PPP funds from Castro Freight, LLC account ending in #5370 to defendants ROBERT PEARSON and LAKISHA PEARSON's Unity Tax Express, LLC account.
20	March 11, 2021	JALIYAH GODWIN, ROBERT PEARSON, and LAKISHA PEARSON	Defendant JALIYAH GODWIN did transfer \$76,312.00 in PPP funds from JJG Brokerage, LLC account ending in #5540 to defendants ROBERT PEARSON and LAKISHA PEARSON's Unity Tax Express, LLC account.
21	March 18, 2021	GLENDON JONES, ROBERT PEARSON, and LAKISHA PEARSON	Defendant GLENDON JONES did transfer \$76,312.00 in PPP funds from Reliable Brokerage, LLC account ending in #4889 to defendants ROBERT PEARSON and LAKISHA PEARSON's Unity Tax Express, LLC account.
22	March 18, 2021	RONEISHA DENNIS, ROBERT PEARSON, and LAKISHA PEARSON	Defendant RONEISHA DENNIS did transfer \$76,312.00 in PPP funds from All in One Brokerage, LLC account ending in #4897 to defendants ROBERT PEARSON and LAKISHA PEARSON's Unity Tax Express, LLC account.
23	April 5, 2021	MELVIN HARRIS, ROBERT PEARSON, and LAKISHA PEARSON	Defendant MELVIN HARRIS did transfer \$79,904.00 in PPP funds from Big Baby Brokerage, LLC account ending in #4900 to

			defendants ROBERT PEARSON and LAKISHA PEARSON's Unity Tax Express, LLC account.
24	April 6, 2021	MARECEO HOBSON, ROBERT PEARSON, and LAKISHA PEARSON	Defendant MARECEO HOBSON did transfer \$53,000.00 in PPP funds from 3 Love Trucking, LLC account ending in #4986 to defendants ROBERT PEARSON and LAKISHA PEARSON's Unity Tax Express, LLC;
25	March 24, 2021	DORIS PEARSON, ROBERT PEARSON, and LAKISHA PEARSON	Defendant DORIS PEARSON did transfer \$62,000.00 in PPP funds from A AND D Trucking, LLC account ending in #4803 to defendants ROBERT PEARSON and LAKISHA PEARSON's Unity Tax Express, LLC account.
26	May 13, 2021	LAKISHA PEARSON	Defendant LAKISHA PEARSON did transfer \$27,117.58 in PPP funds from the Unity Tax Express, LLC account to the Bank of Holly Springs.
27	May 18, 2021	TERRANCE ISOM, ROBERT PEARSON, and LAKISHA PEARSON	Defendant TERRANCE ISOM did transfer \$76,312.00 in PPP funds from Trey's Consolidated Freight, LLC account ending in #4862 to defendants ROBERT PEARSON and LAKISHA PEARSON's GKWTD Trucking, LLC account.
28	May 26, 2021	DAMETRIS PEARSON, ROBERT PEARSON, and LAKISHA PEARSON	Defendant DAMETRIS PEARSON did transfer \$58,691.00 in PPP funds from DLP Brokerage, LLC account ending in #4838 to defendants ROBERT PEARSON and LAKISHA PEARSON's Unity Tax Express, LLC account.

Each monetary transaction being a violation of Title 18, United States Code, Section 1957(a).

WIRE FRAUD FORFEITURE ALLEGATION

(18 U.S.C. § 982(a)(2)(A))

The Grand Jury further finds:

35. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Sections 1349 and 1343, set forth in Counts One through Fourteen, the defendants,

ROBERT PEARSON, LAKISHA PEARSON, GLENDON JONES, RONEISHA DENNIS, MELVIN HARRIS, DAMETRIS PEARSON, TERRANCE ISOM, DEVONTE SMITH, JALIYAH GODWIN, JACOBY ALEXANDER, KEVIN ANDERSON, DIANNE COX, DORIS PEARSON, and MARECEO HOBSON,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any property constituting, or derived from, proceeds he obtained directly or indirectly, as result of such violations. The property to be forfeited includes, but is not limited to, the following assets:

- a. \$217,569.97 in U.S. currency seized from First South Financial Bank account ending in #3294.
- b. \$275.23 in U.S. currency seized from First South Financial Bank account ending in #8515.
- c. \$15,002.41 in U.S. currency seized from First South Financial Bank account ending in #8507.
- d. \$15,002.41 in U.S. currency seized from First South Financial Bank account ending in #8509.
- e. \$43,269.60 in U.S. currency seized from Bank of Holly Springs account ending in #5233.
- f. \$93,355.30 in U.S. currency seized from Bank of Holly Springs account ending in #9255.
- g. \$14,229.03 in U.S. currency seized from Bank of Holly Springs account ending in #5233.

- h. Real property identified as Lot No. 10, Coldwater Hills Subdivison, 1.50 acres, more or less, located in Section 10, Township 2 South, Range 3 West, Marshall County, Mississippi, as recorded in Plat File 1021A filed for record in the office of the Chancery Clerk of Marshall County, Mississippi
- i. Real property identified as Lot 57, Section C, Haraway Gardens Subdivison, located in Section 34, Township 1 South, Range 6 West, DeSoto County, Mississippi, as recorded in Plat Book 39, Page 1, in the Chancery Clerk's Office of DeSoto County, Mississippi
- j. Real property identified as Lot 226, Neighborhood C, Cherry Tree Park Subdivison, situated in Section 16, Township 2 South, Range 7 West, DeSoto County, Mississippi, as per plat of record in Plat Book 94, Page 40, in the Chancery Clerk's Office of DeSoto County, Mississippi
- k. 2013 Jaguar XJL SAJWJ2GD9D8V47773
- l. 4-Pro Turn Z Lawn mower VIN/SERIAL: 002290
- m. Areins Kawasaki Lawn mower VIN/SERIAL: 023368
- n. Gate Trailer Open trailer VIN/SERIAL: 46CFB1415MM038394
- o. 2021 Kawasaki ATV JKAVFDL35MB509684
- p. 2021 CAN AM ATV 3JBLGAR46MJ004100
- q. 2007 Freightliner Conventional Semi-Truck VIN: 1FUJA6CV37LW93837
- r. 1998 Pontiac Firebird VIN: 2G2FV22G6W2218134
- s. 2021 Ford 350 VIN: 1FT8W3BT0MEC97502
- t. 2021 Polaris ATV VIN/SERIAL: 4XASXE858MB330908
- u. 2021 CAN AM ATV VIN/SERIAL: 3JBLGAR44MJ003270
- v. 2021 CAN AM ATV VIN/SERIAL: 3JBLWAT41MJ001360
- w. 2021 Polaris ATV VIN/SERIAL: 3NSPAL927MF146645

- x. 2021 Toyota Camry VIN: 4T1K61AK4MU430881
- y. 2021 Toyota Camry VIN: 4T1K61AK8MU543622
- z. 2021 Cadillac CT5 VIN: 1G6DN5RW9M0127491
- aa. 2021 GMC Yukon VIN: 1GKS1GKD8MR295966
- bb. 2021 GMC Sierra VIN: 1GT49REY8MF125888
- cc. 2016 Kenworth Truck Semi-Truck 1XKYDP9X1GJ129602

If any of the property described above as being forfeitable pursuant to Title 18, United States Code, Section 982(a)(2)(A), as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described above.

All pursuant to Title 18, United States Code, Section 982 (a)(2)(A), and Title 28, United States Code, Section 2461(c).

MONEY LAUNDERING FORFEITURE ALLEGATION
(18 U.S.C. § 982(a)(1))

36. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Section 1957, set forth in Counts 15 through 26, the defendants,
- ROBERT PEARSON, LAKISHA PEARSON, GLENDON JONES, RONEISHA DENNIS, MELVIN HARRIS, DAMETRIS PEARSON, TERRANCE ISOM, DEVONTE SMITH, JALIYAH GODWIN, JACOBY ALEXANDER, KEVIN ANDERSON, DIANNE COX, DORIS PEARSON, and MARECEO HOBSON,
37. shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offense, or any property traceable to such property. The property to be forfeited includes, but is not limited to, the following assets:
- a. \$217,569.97 in U.S. currency seized from First South Financial Bank account ending in #3294.
 - b. \$275.23 in U.S. currency seized from First South Financial Bank account ending in #8515.
 - c. \$15,002.41 in U.S. currency seized from First South Financial Bank account ending in #8507.
 - d. \$15,002.41 in U.S. currency seized from First South Financial Bank account ending in #8509.
 - e. \$43,269.60 in U.S. currency seized from Bank of Holly Springs account ending in #5233.
 - f. \$93,355.30 in U.S. currency seized from Bank of Holly Springs account ending in #9255.
 - g. \$14,229.03 in U.S. currency seized from Bank of Holly Springs account ending in #5233.
 - h. Real property identified as Lot No. 10, Coldwater Hills Subdivison, 1.50 acres, more or less, located in Section 10, Township 2 South, Range 3 West, Marshall

County, Mississippi, as recorded in Plat File 1021A filed for record in the office of the Chancery Clerk of Marshall County, Mississippi

- i. Real property identified as Lot 57, Section C, Haraway Gardens Subdivison, located in Section 34, Township 1 South, Range 6 West, DeSoto County, Mississippi, as recorded in Plat Book 39, Page 1, in the Chancery Clerk's Office of DeSoto County, Mississippi
- j. Real property identified as Lot 226, Neighborhood C, Cherry Tree Park Subdivison, situated in Section 16, Township 2 South, Range 7 West, DeSoto County, Mississippi, as per plat of record in Plat Book 94, Page 40, in the Chancery Clerk's Office of DeSoto County, Mississippi
- k. 2013 Jaguar XJL SAJWJ2GD9D8V47773
- l. 4-Pro Turn Z Lawn mower VIN/SERIAL: 002290
- m. Areins Kawasaki Lawn mower VIN/SERIAL: 023368
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- o. 2021 Kawasaki ATV JKAVFDL35MB509684
- p. 2021 CAN AM ATV 3JBLGAR46MJ004100
- q. 2007 Freightliner Conventional Semi-Truck VIN: 1FUJA6CV37LW93837
- r. 1998 Pontiac Firebird VIN: 2G2FV22G6W2218134
- s. 2021 Ford 350 VIN: 1FT8W3BT0MEC97502
- t. 2021 Polaris ATV VIN/SERIAL: 4XASXE858MB330908
- u. 2021 CAN AM ATV VIN/SERIAL: 3JBLGAR44MJ003270
- v. 2021 CAN AM ATV VIN/SERIAL: 3JBLWAT41MJ001360
- w. 2021 Polaris ATV VIN/SERIAL: 3NSPAL927MF146645
- x. 2021 Toyota Camry VIN: 4T1K61AK4MU430881
- y. 2021 Toyota Camry VIN: 4T1K61AK8MU543622

z. 2021 Cadillac CT5 VIN: 1G6DN5RW9M0127491

aa. 2021 GMC Yukon VIN: 1GKS1GKD8MR295966

bb. 2021 GMC Sierra VIN: 1GT49REY8MF125888

cc. 2016 Kenworth Truck Semi-Truck 1XKYDP9X1GJ129602

If any of the property described above as being forfeitable pursuant to Title 18, United States Code, Section 982(a)(1), as a result of any act or omission of the defendants

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described above.

All pursuant to Title 18, United States Code, Section 982 (a)(1), and Title 28, United States Code, Section 2461(c).

A TRUE BILL


CLAY JOYNER
UNITED STATES ATTORNEY

/s/ Signature Redacted
FOREPERSON